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FILED
9/24/2021 11:36 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021L009484

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

ANA GARCIA,

Plaintiff,

No. 14952807

vs.

Ad Damnum: In Excess of \$50,000.00

TARGET CORPORATION,

Defendant.

COMPLAINT AT LAW

NOW COMES Plaintiff, ANA GARCIA, by her attorneys, ANKIN LAW OFFICE LLC, and complaining of Defendant, TARGET CORPORATION (hereinafter referred to as "TARGET"), states as follows:

COUNT I- NEGLIGENCE

1. On and prior to October 3, 2019, Defendant, TARGET, was a corporation existing by and under the laws of the State of Minnesota, in good standing with the Illinois Secretary of State, and doing substantial business in the County of Cook, State of Illinois.

2. On and prior to October 3, 2019, Plaintiff, ANA GARCIA, was a resident of the City of Chicago, County of Cook, and State of Illinois.

3. On or about October 3, 2019, and for a long time prior thereto, Defendant, TARGET, owned and/or maintained or had a duty to maintain, both individually and by and/or through its agents, servants and/or employees, a building located at 2939 West Addison Street, in the City of Chicago, County of Cook, State of Illinois.

4. That on October 3, 2019, Plaintiff, ANA GARCIA, was lawfully on said premises at 2939 West Addison Street, in the City of Chicago, County of Cook, State of Illinois.



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5. That on and prior to October 3, 2019, Defendant, TARGET, had a duty to keep its premises safe for those lawfully on the premises to include Plaintiff herein, ANA GARCIA.

6. Notwithstanding its duty, Defendant, TARGET, by and through its agents, servants and/or employees, allowed litter, debris, and/or other hazards to accumulate on the floor of said premises, in an area frequently used by those lawfully on the premises, for an unreasonable period of time, and thus created a dangerous condition and, as a result, Plaintiff, ANA GARCIA, fell and injured herself.

7. At the aforesaid time and place, Defendant, TARGET, as the owner and/or maintainer of the aforementioned premises, either individually or by and through its agents, servants and/or employees acted with less than reasonable care and was then and there guilty of one or more of the following careless and negligent acts and/or omissions:

- a. Improperly operated, managed, maintained, and controlled its premises in allowing its floor to remain in a dangerous and poor condition;
- b. Failed to warn Plaintiff and other persons lawfully on said premises of the dangerous condition when Defendants knew or should have known in the exercise of ordinary care that said warning was necessary to prevent injury to Plaintiff;
- c. Failed to make a reasonable inspection of its premises when it knew or in the exercise of ordinary care should have known that said inspection was necessary to prevent injury to Plaintiff and others lawfully on said premises;
- d. Failed to clean, pick up, or otherwise correct a slipping/falling hazard, litter, and/or debris off the floor of its premises;
- e. Failed to provide adequate safeguards to prevent Plaintiff from injury while Plaintiff was lawfully upon said premises; and
- f. Was otherwise negligent in failing to keep its premises safe.

8. As a direct and proximate result of one or more of the foregoing negligent acts or omissions of Defendant, TARGET, Plaintiff, ANA GARCIA, sustained serious and permanent



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injuries when she slipped and fell on said premises; was required to seek medical consultation and treatment; has expended, and will in the future expend, great sums of money to be healed and cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, physical and mental suffering; and was deprived of earnings to which she might have otherwise been entitled.

WHEREFORE, Plaintiff, ANA GARCIA, prays for judgment against Defendant, TARGET CORPORATION, in such an amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate Plaintiff for her injuries, losses, and damages as herein above alleged, costs of suit, and any further relief which this Honorable Court finds fair and just.

Respectfully Submitted,

Maria Merman

Maria Merman,
Attorney for Plaintiff

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RULE 222(b) AFFIDAVIT

I, Maria Merman, being first duly sworn on oath, depose and state that the amount of damages sought in the above-captioned cause of action exceeds \$50,000.00 for the Plaintiff.

By: Maria Merman
Attorney for Plaintiff

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